

Remarks

In reply to the action mailed July 22, 2003, Applicant asks that all claims be allowed in view of the amendment to the claims and remarks contained on the following sheets, a total of 17 pages. This amendment is being filed concurrently with a Request for Continued Examination.

Claims 1-24 are now pending, of which claims 1, 12, 13, 14, 20, and 21 are independent and claims 16-24 are added by this amendment.

Claims 1-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bertram (U.S. Patent No. 5,818,446) in view of "Alexa Internet and Netscape Team To Provide Related Sites To Support Smart Browsing" (hereinafter "Alexa"). Applicant requests reconsideration and withdrawal of this rejection in view of the following remarks.

Amended claim 1 is directed to a web browser that, *inter alia*, adds a new control element to the chrome being displayed while maintaining at least one element of the chrome that was displayed prior to the addition of the new control element. Moreover, the chrome that is displayed by the chrome display program adds a control element to the chrome displayed while maintaining at least one element of the chrome displayed prior to the addition of the new control element. The new control element is configured to invoke functionality related to the current web site being rendered.

Applicant requests reconsideration and withdrawal of the rejection to claim 1 because neither Bertram, Alexa, nor any combination of the two describes or suggests a web browser program configured such that a control element that is configured to invoke functionality related to the current web site being rendered is added to chrome being displayed while maintaining at least one element of the chrome that was displayed prior to the addition of the new element.

Bertram is directed to a mechanism for wholesale substitution of one user interface for another user interface. Bertram discloses that a user interface includes buttons. See Bertram at col. 3, lines 57-60 ("The user interface is typically a static array of functionally selectable icons, scrollbars, typing fields, buttons and the like display [sic] that engage display and data management functions at the request of the user."). Bertram discloses "a computer system having changeable user interfaces." See Bertram at col. 3, lines 1-2. Bertram notes the need for switching "between user interfaces at the preference of the user or when the data being displayed to a user changes in such a fashion that a different user interface would be better suited to the

display and user needs.” See Bertram at col. 6, lines 21-25. Bertram discloses that “[c]hanges between various user interfaces presented to the user should be quick, simple and easily selectable and automatic when possible.” See Bertram at col. 6, lines 26-28. Accordingly, Bertram describes the substitution of a different user interface as evidenced, *inter alia*, by the statement that “[c]hanges between various user interfaces” occur. Bertram does not describe the addition of a control element of the user interface, but rather, Bertram discloses changes between user interfaces. Similarly, Bertram discloses “a substitution of the new interface control 3 in FIG. 2.” See Bertram at col. 10, lines 16-17. As shown in FIG. 2, the new interface control 3 includes multiple chrome elements that replace all of the elements of the previous user interfaces chrome shown in FIG. 1 with a new chrome such that none of the chrome elements in FIG. 2 are the same as the chrome elements in FIG. 1. Thus, Bertram replaces all of the chrome and does not add an control element to the chrome.

The Examiner states that Bertram, in teaching “an automatic or selective modification of the user interface to suit the preference of a user” at col. 2, lines 17-21 and discussing how a user interface is switched at col. 7, lines 26-35, inherently implies selective addition or change to the prior displayed chrome set. The Applicant respectfully disagrees. Bertram discloses the “automatic or selective modification of the user interface.” See Bertram at col. 2, lines 19-21. Similarly, Bertram describes how “any user interface is changed by simply removing the currently active user interface and control code being executed in the processor and replacing it with a new user interface and control code with affecting the data being displayed. The user interface can be switched automatically in response to the receipt of a communicated desire to change the interface based on data content or format or it can be switched by the specific request of the user.” See Bertram at col. 7, lines 26-35. Here, too, Bertram only discloses changing “any user interface ... by ... removing the currently active user interface ... and replacing it with a new user interface.”

In contrast with Bertram, amended claim 1 recites chrome being displayed by a chrome display program that adds a control element configured to invoke functionality related to the current web site being rendered to the chrome being displayed while maintaining at least one element of the chrome that was displayed prior to the addition of the new element. At page 6, lines 25-29, the Specification describes generating a dollar-signed shaped button in the chrome

portion of the display in response to a chrome specifier of the current web site. This example illustrates that the chrome element of a button is added to the chrome (as opposed to the whole chrome being replaced as in Bertram). As such, Bertram does not describe or suggest chrome being displayed by a chrome display program that adds a control element configured to invoke functionality related to the current web site being rendered to the chrome displayed while maintaining at least one element of the chrome that was displayed prior to the addition of the new control element.

Alexa is directed to providing related web site information and does not remedy the failure of Bertram to describe or suggest chrome being displayed by a chrome display program that adds a control element configured to invoke functionality related to the current web site being rendered to the chrome displayed while maintaining at least one element of the chrome that was displayed prior to the addition of the new control element.

The Examiner states that Alexa teaches adding a new element to the chrome and cites Alexa at page 3, lines 20-25 describing adding advertising on a toolbar. The Applicant respectfully disagrees that Alexa so teaches. Alex displays advertisements in the feature pop-up windows and on the toolbar. However, Alexa discloses displaying advertisements which corresponds to content being displayed and therefore is not a control element of the chrome. Moreover, amended claim 1 recites that the new control element is configured to invoke functionality related to the current web site being rendered. The pop-up advertisements disclosed in Alexa do not relate to the current web site being rendered. Thus, Alex does not remedy the failure of Bertram to describe or suggest the subject matter of amended claim 1.

Neither do any of the references Eric Miller, "An Introduction to the Resource Description Framework," D-Lib Magazine, May 1998, pages 1-12, Peyer (U.S. Patent No. 6,188,401), or Brown, et al. "Using Netscape 2" published by Que Corporation 1995, page 74, remedy the failure of Alexa and Bertram to describe or suggest the subject matter of amended claim 1.

Therefore, neither Bertram, Alexa, nor the combination of the two describe or suggest the subject matter of amended claim 1. For at least these reasons, Applicant requests reconsideration and withdrawal of the rejection of claim 1 and claims 2-11, which depend from claim 1.

The Examiner also rejects claim 15 as being unpatentable over “Ad on the Bar Campaign Supplements Alexa’s Focused Advertising Program,”

http://www.alexa.com/press/press_releases/ad.html, pages 1-3, published 12/10/1997

(hereinafter, “Alexa 2”). Alexa 2 discloses the display of advertisements on a toolbar. As such, Alexa 2 does not remedy the failure of Alexa and Bertram to describe or suggest the subject matter of amended claim 1.

Claim 15 is directed to a feature of the web browser program recited in amended claim 1 and depends from claim 1. More particularly, claim 15 recites the chrome corresponding to the chrome specifiers of the current web site being rendered and displayed by the chrome display program adds a new control element to the chrome displayed based on past web sites rendered by the client computer while maintaining at least one element of the chrome displayed prior to the addition of the new control element. For at least these reasons and the reasons described above with respect to independent claim 1, Applicant requests reconsideration and withdrawal of the rejection to claim 15.

Claim 12, recites a web browser that, *inter alia*, displays chrome based on chrome specifiers provided by a web site that is controlled by a party providing content for the current web site being rendered. Thus, as recited in claim 12, chrome specifiers are provided by a web site for the current web site being rendered such that the web site providing the chrome specifiers is different from the current web site being rendered. The web site providing the chrome specifiers is controlled by a party that also provides content for the current web site.

The Examiner states that the user interface in Bertram “is configured by downloading chrome specifiers from the party that provides the content for the current web site” and cites Bertram at col. 7, lines 18-25 and col. 11, lines 4-6 and lines 24-35. The Examiner does not argue, as claim 12 requires, that Bertram discloses that a different web site provides the chrome specifiers than the current web site being rendered. Further, in Bertram, the user interface is controlled by the user. See Bertram at col. 9, lines 61-63 (“Continuing with the example, we will assume that the parent has previously registered the child user interface with the...interface control facility.”). And changes to the interface are triggered in response to “receipt of a communicated desire to change the interface based on data content or format” or “by the specific request of the user.” See Bertram at col. 7, lines 31-34. Thus, Bertram fails to disclose a chrome

displayed based on chrome specifiers provided by a web site that is controlled by a party providing content for the current web site being rendered, as recited by claim 12. Alexa does not remedy this failure of Bertram. Therefore, neither Bertram, Alexa, nor the combination of the two describe or suggest the subject matter of claim 12.

For at least these reasons, Applicant requests withdrawal of the rejection of claim 12.

Claim 13 recites a web browser that, inter alia, displays chrome based on chrome specifiers that correspond to a default chrome that includes words that are based on a language demographic of the user. As neither Bertram, Alexa, nor any combination of the two describes or suggests this feature, Applicant requests reconsideration and withdrawal of the rejection to claim 13.

Bertram substitutes, for "a normal adult or parent browser user interface," a new user interface that includes animal graphics. See Bertram at col. 10, lines 1-19. In contrast, claim 13 recites a chrome that includes words that are based a language demographic of the user. The animal graphics in Bertram do not include or otherwise suggest words. Thus, the animal graphic in Bertram is distinguishable from a chrome that includes words that are based on a language demographic of the user as recited in the present application. Alexa does not remedy this failure of Bertram. Therefore, neither Bertram, Alexa, nor the combination of the two describe or suggest the subject matter of claim 13.

The Examiner states that "it was well known in the art at the time the invention was made that most graphical user interfaces already contain words and/or pictures to describe their functionalities. It is obvious for an ordinary skill in the art to have modified Bertram's teaching to include in the chrome display words and/or pictures based on a language demographic of the user." The Applicant respectfully disagrees that it would have been obvious to have modified Bertram's wordless user interface to include "words that are based on a language demographic of the user," as recited in claim 13. The Applicant respectfully disagrees that modifying a wordless user interface to a user interface that includes words based on the language demographic of the user would have been obvious and respectfully requests that the Examiner provide documentary evidence if the Examiner wishes to maintain the rejection.

For at least these reasons, Applicant requests withdrawal of the rejection of claim 13.

Claim 14 is directed to a web browser that, *inter alia*, displays chrome such that the chrome is based on a chrome specifier corresponding to the current web site being rendered when a chrome specifier is associated with the current web site and such that the chrome returns to a default chrome when a chrome specifier is not associated with the current web site.

Bertram is directed to automatically switching a user interface “in response to the receipt of a communicated desire to change the interface based on data content or format.” See Bertram at col. 7, lines 30-34. A different user interface is presented in response to “particular content or type of content.” See Bertram at col. 7, lines 18-21. A different user interface also may be presented based on a “specific request of the user.” See Bertram at col. 7, lines 33-34. As such, Bertram does not disclose modifying the user interface until another chrome specifier is encountered. In contrast, claim 14 recites that, when a chrome specifier is not associated with the current web site, the chrome returns to a default chrome.

The Examiner admits that Bertram does not explicitly teach the chrome returns to a default chrome when the chrome specifier is not associated with the current web site, as recited in claim 14. Instead, Bertram discloses that a user can switch back to a standard user interface by pressing a key sequence or clicking on an icon. See Bertram, col. 8, lines 30-42. The Examiner states that “[i]t would have been obvious for an ordinary skill in the art at the time the invention was made to have modified [the] Bertram system to return to the default chrome when the chrome specifier is not associated with the current web site.” The Applicant respectfully disagrees that returning to a default chrome would have been obvious and respectfully requests that the Examiner provide documentary evidence if the Examiner wishes to maintain the rejection.

Therefore, neither Bertram, Alexa, nor the combination of the two describe or suggest the subject matter of claim 14. For at least this reason, Applicant requests allowance of claim 14.

New claims 16-19 depend from claims 1, 12, 13 and 14, respectively, and each recite features of original claims 1, 12, 13 and 14. At least for the reasons discussed above with respect to amended independent claims 1, 12, 13 and 14, Applicant requests allowance of claims 16-19.

New claim 20 is directed to a web browser program that, *inter alia*, modifies less than all of the control elements on the chrome and at least one of the modified control elements is configured to invoke functionality related to the current web site being rendered. As described

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previously with respect to claim 1, Bertram replaces all of the chrome. Thus, Bertram does not disclose modifying less than all of the control elements on the chrome. Alexa discloses displaying advertisements, as described above. As such, Alexa does not disclose modifying less than all of the control elements on the chrome, as recited in claim 20.

Therefore, neither Bertram, Alexa, nor the combination of the two describe or suggest the subject matter of claim 20. For at least this reason, Applicant requests allowance of claim 20.

New claim 21 is directed to a method for reconfiguring chrome of a user interface to a web browser program and recites, *inter alia*, adding a new control element to the chrome being displayed while maintaining at least one element of the chrome that was displayed prior to the addition of the new control element. The new control element is configured to invoke functionality related to the current web site being rendered. For at least the reasons described above with respect to claim 1, Applicant requests allowance of claim 21 and new claims 22-24, which depend, directly or indirectly, from new claim 21.

Enclosed is a \$1,014.00 check for the Request for Continued Examination fee (\$770) including the excess claim fees for new independent claims (\$172) and dependent claims (\$72) added by this amendment. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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